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BENJAMIN J. MILLER, ESQ.

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHELLE C. ZEITER, individually, and as
Special Administrator for ESTATE OF
MICHAEL BUCHNA; JENNIFER C. BEAM,
individually, and as Special Administrator for
ESTATE OF MICHAEL S. BUCHNA,

Plaintiffs,

v.

WALMART INC., a foreign corporation d/b/a
WALMART SUPERCENTER #3351; and
WAL-MART STORES, INC., a foreign
corporation; and DOES I through X; inclusive;
and ROE CORPORATIONS I through V,
inclusive,

Defendants.

CASE NO.: 2:21-cv-00061-APG-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE JOINT
PRE-TRIAL ORDER**

IT IS HEREBY STIPULATED by and between Plaintiffs MICHELLE C. ZEITER,
Individually and as Special Administrator for ESTATE OF MICHAEL BUCHNA and
JENNIFER C. BEAM, Individually and as Special Administrator for ESTATE OF MICHAEL
S. BUCHNA (collectively "Plaintiffs"), by and through their attorneys of record SIMON LAW
and BROCK H. OHLSON PLLC, and Defendants WALMART, INC. and WAL-MART

1 STORES, INC. (collectively “Defendants”), by and through their attorneys of record, HALL &
2 EVANS, LLC, (foregoing parties are collectively referred to hereinbelow as “Parties”) hereby
3 submit their Stipulation and Order to Extend the Deadline to File the Joint Pre-Trial Order in
4 order to extend the deadline 31 days from December 20, 2024 to January 20, 2025 pursuant to
5 LR IA 6-1. This is the first stipulation for an extension of the deadline for the Joint Pre-Trial
6 Order.

7 REASONS FOR REQUESTING AN EXTENSION OF DEADLINES

8 The Parties aver that good cause exists to extend the existing deadline to file the Joint
9 Pre-Trial Order by 31 days from the date of the December 20, 2024 deadline, which would be
10 Monday, January 20, 2025. Notably, Defendants’ counsel has advised that national trial
11 counsel is associating into the case. Further, Defendants’ counsel, Kurt Bonds, Esq., has been
12 in trial and also is coordinating his daughter’s wedding this month.

13 Thus, the parties have agreed to extend the respective deadline 31 days as set forth
14 below:

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- Joint Pre-Trial Order Deadline:

• Existing deadline: Friday, December 20, 2024

• **Proposed deadline: Monday, January 20, 2025**

Dated this 11 day of December, 2024.

Dated this 11 day of December, 2024.

SIMON LAW

HALL & EVANS, LLC

/s/ Daniel S. Simon

/s/ Kurt R. Bonds

DANIEL S. SIMON, ESQ.

KURT R. BONDS, ESQ.

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Attorneys for Defendants

Attorneys for Plaintiffs

IT IS SO ORDERED.



DANIEL J. ALBREGTS
UNITED STATES DISTRICT COURT

DATED: 12/13/2024